Consultation Response Form - Building Regulations Part L Review - Changes to Part L (Conservation of Fuel and Power) and Part F (Ventilation) of the Building Regulations for new dwellings

This consultation sets out our plans to improve the energy efficiency requirements for new homes in 2020. The document also provides detail on the direction of travel for energy efficiency requirements for introduction in 2025.

This document is the first stage of a two-part consultation about proposed changes to the Building Regulations. It also covers the wider impacts of Part L for new homes, including changes to Part F (Ventilation), its associated Approved Document guidance, airtightness and improving as-built performance of the constructed home.

You can email your response to the questions in this consultation to: [enquiries.brconstruction@gov.wales](mailto:enquiries.brconstruction@gov.wales)

If you are responding in writing, please make it clear which consultation and which questions you are responding to:

***Building Regulations Part L Review - Changes to Part L (Conservation of Fuel and Power) and Part F (Ventilation) of the Building Regulations for new dwellings.***

Written responses should be sent to:

Building Regulations, Welsh Government, Rhydycar, Merthyr Tydfil, CF48 1UZ.

If you have any queries on this consultation, please email: [enquiries.brconstruction@gov.wales](mailto:enquiries.brconstruction@gov.wales) or telephone: 0300 062 8144.

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| **Data Protection** |
| Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.  The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.  Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone’s name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information. |

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| **Confidentiality** |
| Responses to consultations may be made public on the internet or in a report.  **If you do not want your name and address to be shown on any documents we produce please indicate here**  **If you do not want your response to be shown in any document we produce please indicate here** |

**CONSULTATION FORM**

|  |  |
| --- | --- |
| **Amendments to statutory guidance** | |
| **Date:** | |
| Your Name: |  |
| Your Position *(if applicable):* |  |
| Your Organisation *(if applicable):* |  |
| Email / Telephone Number: |  |
| Your address: |  |

|  |  |
| --- | --- |
| Type of Organisation: **Choose one of the following**: | Select one |

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| --- | --- |
| Builder / Developer |  |
| Small/medium builder |  |
| Volume house builder |  |
| Designer / Engineer /Surveyor |  |
| Local Authority |  |
| Building Control Approved Inspector |  |
| Architect |  |
| Manufacturer/supply chain |  |
| Energy Assessor |  |
| Energy sector |  |
| Construction professional |  |
| Property Manager / Housing Association / Landlord |  |
|  |  |
| Building Occupier/ Resident |  |
|  |  |
| Other interested party (please specify) |  |

**Question 1**

|  |  |
| --- | --- |
| Do you agree with our expectation that a home built to our part L 2025 should produce 75-80% less CO2 emissions than one built to current Part L requirements? | |
| 1. Yes |  |
| 1. No– 75-80% is too high a reduction in CO2 |  |
| 1. No - 75-80% is too low a reduction in CO2 |  |
| 1. Unsure |  |
| If no, please explain your reasoning and provide evidence to support this. | |
|  | |

**Question 2**

|  |
| --- |
| We think heat pumps and heat networks should typically be used to deliver the low carbon heating requirement of the future standard. What are your views on this and in what circumstances should other low carbon technologies, such as direct electric heating, be used? |
| Please provide comments below: |
|  |

**Question 3**

|  |  |
| --- | --- |
| Do you agree that the fabric package for Option 1 set out in Chapter 3 and Annex A, but with the addition of higher specification glazing (i.e. triple glazing units), provides a reasonable basis for the fabric performance of part L 2025? | |
| 1. Yes |  |
| 1. No – the fabric standard is too demanding |  |
| 1. No – the fabric standard is not demanding enough |  |
| 1. No - high specification glazing (i.e. triple glazing) should be specified in option 1 for the 2020 proposed specification |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 4**

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| --- | --- |
| What level of uplift to the energy efficiency standards in the Building Regulations should be introduced in 2020? | |
| 1. No change |  |
| 1. Option 1 – 37% CO2 reduction (the government’s preferred option) |  |
| 1. Option 2 – 56% CO2 reduction |  |
| 1. Other |  |
| 1. Unsure |  |
| Please explain your reasoning. | |
|  | |

**Question 5**

|  |  |
| --- | --- |
| Do you agree with the concerns raised in paragraph 3.1 regarding MVHR systems at this time? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| please explain your reasoning or how these concerns could be overcome in the future. | |
|  | |

**Question 6**

|  |  |
| --- | --- |
| Do you agree with using primary energy as the principal performance metric? | |
| 1. Yes – primary energy should be the principal performance metric |  |
| 1. No – CO2 should remain the principal performance metric |  |
| 1. No – another measure should be the principal performance metric |  |
| 1. Unsure |  |
| Please explain your reasoning and provide evidence to support this. | |
|  | |

**Question 7**

|  |  |
| --- | --- |
| Do you agree with using CO2 as the secondary performance metric? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| Please explain your reasoning. | |
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**Question 8**

|  |  |
| --- | --- |
| Do you agree the need to set a minimum target to ensure that homes are affordable to run? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| Please explain your reasoning. | |
|  | |

**Question 9**

|  |  |
| --- | --- |
| If yes above should the minimum target used to ensure that homes are affordable to run be a minimum Energy Efficiency Rating? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If yes, please suggest a minimum Energy Efficiency Rating that should be achieved and provide evidence to support this. | |
| If no, please suggest an alternative metric, explain your reason and provide evidence to support this. | |
|  | |

**Question 10**

|  |  |
| --- | --- |
| Do you agree with the proposed minimum fabric standards set out in Table 3.1? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If you do not agree with any one or more of the proposed standards, please explain your reasoning and provide evidence to support this. | |
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**Question 11**

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| --- | --- |
| Do you agree that the limiting U-value for roof-lights should be based on a roof-light in a horizontal position? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning and provide evidence to support this. | |
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**Question 12**

|  |  |
| --- | --- |
| Do you agree that we should adopt the latest version of BR 443? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning and provide evidence to support this. | |
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**Question 13**

|  |  |
| --- | --- |
| Do you agree with the proposal of removing fuel factors to aid the transition from high-carbon fossil fuels? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
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**Question 14**

|  |  |
| --- | --- |
| Do you agree with the proposed changes to minimum building services efficiencies and controls set out in Table 3.2? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If you do not agree with any or more of the proposed changes, please explain your reasoning and provide evidence to support this. | |
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**Question 15**

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| --- | --- |
| Do you agree with the proposal that heating systems in new dwellings should be designed to operate with a flow temperature of 55°C? | |
| 1. Yes |  |
| 1. No – the temperature should be below 55°C |  |
| 1. No – dwellings should not be designed to operate with a low flow temperature |  |
| 1. No – I disagree for another reason |  |
| 1. Unsure |  |
| If no, please explain your reasoning and provide evidence. | |
|  | |

**Question 16**

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| --- | --- |
| How should we encourage new dwellings to be designed to operate with a flow temperature of 55°C? | |
| 1. By setting a minimum standard |  |
| 1. Through the target primary energy and target emission rate (i.e. through the notional building) |  |
| 1. Other |  |
| 1. Unsure |  |
| Please explain your reasoning. | |
|  | |

**Question 17**

|  |  |
| --- | --- |
| Do you agree with the proposal to improve minimum fabric standards in new dwellings to help futureproof the house for low carbon/temperature heating systems? | |
| 1. Yes |  |
| 1. No – the current minimum fabric levels are sufficient |  |
| 1. No – I disagree for another reason |  |
| 1. Unsure |  |
| If the third option, please explain your reasoning. | |
|  | |

**Question 18**

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| --- | --- |
| Do you agree with the proposals to simplify the requirements in the Building Regulations for the consideration of high-efficiency alternative systems? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 19**

|  |  |
| --- | --- |
| Do you agree with the removal of government Approved Construction Details from Approved Document L? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 20**

|  |  |
| --- | --- |
| Do you agree with the proposal to introduce the technology factors for heat networks, as presented in the draft Approved Document? | |
| 1. Yes |  |
| 1. No – they give too much of an advantage to heat networks |  |
| 1. No – they do not give enough of an advantage to heat networks |  |
| 1. No – I disagree for another reason |  |
| 1. Unsure |  |
| Please explain your reasoning. | |
|  | |

**Question 21**

|  |  |
| --- | --- |
| Do you agree with removing this supplementary guidance from Approved Document L, as outlined in paragraph 3.65 of the consultation document? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 22**

|  |  |
| --- | --- |
| Do you agree with the external references used in the draft Approved Document L, in Appendix C and Appendix D? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning and suggest any alternative sources. | |
|  | |

**Question 23**

|  |  |
| --- | --- |
| Do you agree with incorporating the Compliance Guides into the Approved Documents? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 24**

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| --- | --- |
| Do you agree that we have adequately covered matters which are currently in the Domestic Building Services Compliance Guide in the new draft Approved Document L for new dwellings? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain which matters are not adequately covered. | |
|  | |

**Question 25**

|  |  |
| --- | --- |
| Do you agree that we have adequately covered matters which are currently in the Domestic Ventilation Compliance Guide in the new draft Approved Document F for new dwellings? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain which matters are not adequately covered. | |
|  | |

**Question 26**

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| --- | --- |
| Do you agree with all of the proposals for restructuring the Approved Document guidance? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 27**

|  |  |
| --- | --- |
| Do you agree with our proposed approach to mandating self-regulating devices in new dwellings? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 28**

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| --- | --- |
| Are there circumstances in which installing self-regulating devices in new dwellings would not be technically or economically feasible? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If yes, please explain your reasoning and provide evidence. | |
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**Question 29**

|  |  |
| --- | --- |
| Do you agree with proposed guidance on providing information about building automation and control systems for new dwellings? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
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**Question 30**

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| --- | --- |
| Do you agree that the guidance in Appendix B to draft Approved Document F provides an appropriate basis for setting minimum ventilation standards? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
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**Question 31**

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| --- | --- |
| Do you agree that using individual volatile organic compounds, informed by Public Health England guidelines, is an appropriate alternative to using a total volatile organic compound limit? | |
| 1. Yes |  |
| 1. No – the Public Health England guidelines are not sufficient |  |
| 1. No – individual volatile organic compounds should not be used to determine ventilation rates |  |
| 1. No – I disagree for another reason |  |
| 1. Unsure |  |
| If no, please explain your reasoning, and provide alternative evidence sources if appropriate. | |
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**Question 32**

|  |  |
| --- | --- |
| Do you agree with the proposed guidance on minimising the ingress of external pollutants in the draft Approved Document F? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 33**

|  |  |
| --- | --- |
| Do you agree with the proposed guidance on noise in the draft Approved Document F? | |
| 1. Yes |  |
| 1. No – this should not form part of the statutory guidance for ventilation, or the guidance goes too far |  |
| 1. No – the guidance does not sufficiently address the problem |  |
| 1. No – I disagree for another reason |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 34**

|  |  |
| --- | --- |
| Do you agree with the proposal to remove guidance for passive stack ventilation systems from the Approved Document? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 35**

|  |  |
| --- | --- |
| Do you agree with the proposal to remove guidance for more airtight naturally ventilated homes? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 36**

|  |  |
| --- | --- |
| Do you agree with the proposed guidance for background ventilators in naturally ventilated dwellings in the draft Approved Document F? | |
| 1. Yes |  |
| 1. No – the ventilator areas are too large |  |
| 1. No – the ventilator areas are too small |  |
| 1. No – I disagree for another reason |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 37**

|  |  |
| --- | --- |
| Do you agree with the proposed approach for determining minimum whole building ventilation rates in the draft Approved Document F? | |
| 1. Yes |  |
| 1. No – the ventilation rate is too high |  |
| 1. No – the ventilation rate is too low |  |
| 1. No – I disagree for another reason |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 38**

|  |  |
| --- | --- |
| Do you agree that background ventilators should be installed for a continuous mechanical extract system, at 5000mm2 per habitable room? | |
| 1. Yes |  |
| 1. No – the minimum background ventilator area is too low |  |
| 1. No – the minimum background ventilator area is too high |  |
| 1. No – other |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 39**

|  |  |
| --- | --- |
| Do you agree with the external references used in the draft Approved Document F, in Appendices B, D and E? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
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**Question 40**

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| --- | --- |
| Do you agree with the proposed commissioning sheet proforma given in Appendix C of the draft Approved Document F, volume 1? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning and suggest any alternative sources. | |
|  | |

**Question 41**

|  |  |
| --- | --- |
| Do you agree with the proposal to provide a completed checklist and commissioning sheet to the building owner? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 42**

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| --- | --- |
| Do you agree that there should be a limit to the credit given in SAP for energy savings from airtightness for naturally ventilated dwellings? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 43**

|  |  |
| --- | --- |
| Do you agree that the limit to the credit should be set at 3m3/m2.h? | |
| 1. Yes |  |
| 1. No – it is too low |  |
| 1. No – it is too high |  |
| 1. Unsure |  |
| If no, please explain your reasoning and provide evidence. | |
|  | |

**Question 44**

|  |  |
| --- | --- |
| Is having a standard level of uncertainty of 0.5m3/m2.h appropriate for all dwellings undergoing an airtightness test? | |
| 1. Yes |  |
| 1. No – a percentage uncertainty would be more appropriate |  |
| 1. No – I agree with having a standard level of uncertainty, but 0.5m3/m2.h is not an appropriate figure |  |
| 1. No – I disagree for another reason |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 45**

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| --- | --- |
| Currently, only a proportion of dwellings are required to be airtightness tested. Do you agree with the proposal that all new dwellings should be airtightness tested? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning and provide evidence to support this. | |
|  | |

**Question 46**

|  |  |
| --- | --- |
| Currently, small developments are excluded from the requirement to undergo airtightness tests. Do you agree with including small developments in this requirement? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning and provide evidence to support this. | |
|  | |

**Question 47**

|  |  |
| --- | --- |
| Do you agree that the Pulse test should be introduced into statutory guidance as an alternative airtightness testing method alongside the blower door test? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 48**

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| --- | --- |
| Do you think that the proposed design airtightness range of between 1.5m3/m2.h and the maximum allowable airtightness value in Approved Document L Volume 1 is appropriate for the introduction of the Pulse test? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning and provide evidence to support this. | |
|  | |

**Question 49**

|  |  |
| --- | --- |
| Do you agree that we should adopt an independent approved airtightness testing methodology? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| Please explain your reasoning. | |
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**Question 50**

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| --- |
| Do you agree with the content of the CIBSE draft methodology? |
| Please make any comments here. |
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**Question 5**1

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| --- | --- |
| Do you agree with the introduction of guidance for Build Quality in the Approved Document becoming part of the reasonable provision for compliance with the minimum standards of Part L? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| Please explain your reasoning and provide evidence to support this. | |
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**Question 52**

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| Do you have any comments on the Build Quality guidance in Annex C? |
| Please make any comments here. |
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**Question 53**

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| --- | --- |
| Do you agree with the introduction of a standardised compliance report, the Building Regulations Wales Part L (BRWL) report, as presented in Annex D? | |
| 1. Yes |  |
| 1. No – there is no need for a standardised compliance report |  |
| 1. No – I agree there should be a standardised compliance report, but do not agree with the draft in Annex D |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
|  | |

**Question 54**

|  |  |
| --- | --- |
| Do you agree with the introduction of photographic evidence as a requirement for producing the as-built energy assessment for new dwellings? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning. | |
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**Question 55**

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| --- | --- |
| Do you agree with the proposal to require the signed standardised compliance report (BRWL) and the supporting photographic evidence to be provided to Building Control? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| Please explain your reasoning. | |
|  | |

**Question 56**

|  |  |
| --- | --- |
| Do you agree with the proposal to provide the homeowner with the signed standardised compliance report (BRWL) and photographic evidence? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| Please explain your reasoning. | |
|  | |

**Question 57**

|  |  |
| --- | --- |
| Do you agree with the proposal to specify the version of Part L that the home is built to on the EPC? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| Please explain your reasoning. | |
|  | |

**Question 58**

|  |  |
| --- | --- |
| Do you agree Approved Document L should provide a set format for a home energy guide in order to inform homeowners how to efficiently operate their dwelling? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If yes, please provide your views on what should be included in the guide. | |
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**Question 59**

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| --- | --- |
| Do you agree that the transitional arrangements for the energy efficiency changes in 2020 should not apply to individual buildings where work has not started within a reasonable period – resulting in those buildings having to be built to the new energy efficiency standard? | |
| 1. Yes – where building work has commenced on an individual building within a reasonable period, the transitional arrangements should apply to that building, but not to the buildings on which building work has not commenced |  |
| 1. No – the transitional arrangements should continue to apply to all building work on a development, irrespective of whether or not building work has commenced on individual buildings |  |
| 1. Unsure |  |
| If yes, please suggest a suitable length of time for the reasonable period in which building work should have started. | |
| If no, please explain your reasoning and provide evidence to support this. | |
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**Question 60**

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| --- | --- |
| Do you foresee any issues that may arise from the proposed 2020 transitional arrangements outlined in this consultation? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| Please explain your reasoning and provide evidence to support this. | |
|  | |

**Question 61**

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| --- | --- |
| Overall, do you think the assessment of the impact on development is broadly fair and reasonable? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| Please justify your view and provide alternative evidence if necessary. | |
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**Question 62**

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| --- | --- |
| The Impact Assessment makes a number of assumptions on fabric/services/ renewables costs, new build rates, phase-in rates, learning rates, etc for new homes. Do you think these assumptions are fair and reasonable? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| Please explain your reasoning and provide evidence to support this. | |
|  | |

**Question 63**

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| --- | --- |
| Overall, do you think the impact assessment is a fair and reasonable assessment of the potential costs and benefits of the proposed options for new homes? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If no, please explain your reasoning and provide evidence to support this. | |
|  | |

**Question 64**

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| --- | --- |
| Do you consider that it is reasonable for a 75% reduction of the combined cost of radiators and associated heating distribution pipework associated with reducing the space heating load to around 15kWh/m2/year in SAP? | |
| 1. Yes |  |
| 1. No |  |
| 1. Unsure |  |
| If either yes or no, please explain your reasoning and provide evidence to support this. | |
|  | |

**Question 65**

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| We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.  What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated? |
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**Question 66**

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| Please also explain how you believe the proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language. |
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Responses to consultations are likely to be made public, on the internet or in a report.  If you would prefer your response to remain anonymous, please tick **here**